

Subject: INFORMATION: Access to Type III Emergency Exits

Date: OCT 15, 1991

From: Manager, Transport Airplane Directorate,
Aircraft Certification Service, ANM-100

To: SEE DISTRIBUTION

This memo is to clarify the guidance provided in our memo of May 29, 1991, concerning access to emergency exits, particularly type III exits. The guidance provided in that memo is a reiteration of the previous policy and is also stated in AC 25-17 "Crashworthiness Handbook".

There seems to be confusion regarding the intent of the memo and the impact of the guidance on existing approved arrangements, particularly small transports.

As noted in the May 29 memo, there is a difference in the requirements for transports of 19 passengers or less, and the larger transports. The difference is the degree of accessibility of type III exits and the amount of incursion into the projected opening of the exit by interior furnishings that is allowed. Basically, no such incursion is permitted for larger transports.

Since smaller transports are frequently used in non-commercial service, i.e. corporate operations, the interior arrangements are often quite different than those seen on an air carrier. These arrangements include the use of special seats and divans that sometimes have multiple adjustment features allowing the seat to be moved to several positions. It is not unusual for there to be positions that encroach into the projected opening of the exit, and in some cases result in some physical interference when the exit is opened. However, the point of the May 29 memo was that while encroachment and even interference can be acceptable under the regulations, the exit should be openable. The regulations do not make a distinction in this regard.

Unlike galleys and other interior features, seats are not directly controllable by the crew. The passenger seat is susceptible to the passengers' actions after the cabin crew (when there is a cabin crew) has completed their preparatory duties. For this reason, seatback recline and breakover are fixed by design, to prevent rendering an exit access unacceptable, in the larger transports. That is, crew procedures or placards are not considered adequate to maintain the proper access. This situation is analogous, except that rather than having the design preserve an access requirement, it is the more basic requirement of openability of the exit that is of concern.


Confusion may also exist with respect to galleys and closets that are located near floor level exits. Frequently, these units have compartment doors or drawers that, under certain conditions, could impede that opening of an emergency exit. Where practical, these units incorporate springs or other features to compensate for doors that are left open. However, in this case crew procedures, supplemented by special emphasis placarding are considered adequate when a design solution is not practical, since these areas are remote from passengers and not subject to tampering after crew procedures have been completed.

Please contact Frank Tiangsing, FTS 392-2121 or Jeff Gardlin, FTS 392-2136 if there are any questions concerning the clarifications in this memo.

Prepared by:


Jeff Gardlin

Concur:


Leroy A. Keith

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